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Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 6, 1986

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Mr. Stanley Vendetti, R.S.
Benton-Franklin Health District
506 McKenzie
Richland, WA 99352

Superfund Branch

Re: Recommendations for the Reissuance of the Pasco Sanitary Landfill
Solid Waste Handling Permit

Dear Mr. Vendetti:

Thank you for being so patient in waiting for Ecology's recommendations for the 1986 operating permit for the Pasco Sanitary Landfill. A copy of Ecology's comments on the field investigation at the landfill to Robert G. Courson, Superfund Branch, U. S. Environmental Protection Agency (EPA), will be sent to you soon.

The following recommendations are based on review of the permit application and the new information obtained during EPA's field investigation:

1. It is obvious from the results of the field investigation that contamination of ground water has occurred, in violation of Chapter 90.48 RCW. Continued monitoring is extremely important to verify E & E's results and to gather additional data so that an informative decision can be made as to the next possible action. We, therefore, recommend that a permit condition include quarterly monitoring for a year of the monitoring wells at the site.

Monitoring should include primary and secondary drinking water metals and volatile organics that have been positively identified during the field investigation: 1,1-Dichloroethylene, 1,1-Dichloroethane, Trans-1, 2-Dichloroethylene, Chloroform, 1,1,1-Trichloroethane, Trichloroethylene, Tetrachloroethylene, Toluene, and Total Xylene. One additional sampling for herbicides should be conducted to verify E & E's results. Ecology concurs with EPA's recommendation that several surrounding irrigation wells should be sampled and analyzed for the above mentioned constituents.

At the end of one year, the monitoring data should be reviewed to determine if a change in monitoring frequency or parameters is needed.

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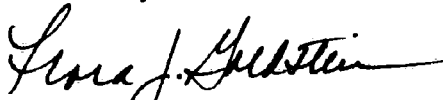
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2. Ecology is also recommending a ban on the disposal of free liquids at the landfill, in accordance with WAC 173-304-460(3)(a)(ii). Free liquids can contribute to leachate generation. Because of the documented ground water contamination, it is imperative to decrease the potential and/or decrease the amount of leachate generated at the site. The free liquids ban would include the disposal of sludge from the city's treatment plant and from septic tanks and chemical toilets.
3. In accordance with the Dangerous Waste Regulations, Chapter 173-303 WAC, it is the responsibility of the generator (EPA) to determine if the drill cuttings are a designated dangerous waste. Ecology's response to EPA on the question of on-site disposal is that the material must be designated non-dangerous waste and have consent by the Benton-Franklin Health District before the cuttings can be disposed of at the landfill.

Please inform this office as to the permit conditions required by the Health District in the 1986 operating permit for the landfill.

If you have any questions, please feel free to contact Carl Nuechterlein or me.

Sincerely,



Flora J. Goldstein
Environmental Quality Division

FJG:adw

cc: Jim Knudson, Ecology/Olympia